

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

*In re J.P. Morgan Stable Value Fund  
ERISA Litigation*

) Master File No. 12-cv-2548-VSB  
) The Honorable Vernon S. Broderick  
)  
) **PROPOSED REVISED JOINT CASE**  
) **MANAGEMENT SCHEDULE**  
)

The parties propose the following modifications to the remaining deadlines to the Revised Joint Case Management Schedule entered by the Court on September 16, 2015 (Dkt. 288) and the post-discovery joint status letter and conference ordered by the Court on November 25, 2015 (Dkt. 310):

- The parties will call expert witnesses at trial. The following schedule shall apply to expert disclosures that are not proffered in support of or in opposition to Plaintiffs' motion for class certification.
  - a. Affirmative expert disclosures due by **January 19, 2016**.
  - b. Depositions of the parties' affirmative experts completed by **February 22, 2016**.
  - c. Responsive expert reports due by **March 21, 2016**.
  - d. Depositions of the parties' responsive experts completed by **April 20, 2016**.
- The parties should submit a joint status update letter to the Court upon the close of all discovery on **April 20, 2016**.
- The Court will hold a post-discovery conference on **April 29, 2016** (or another date so ordered by the Court).
  - Pre-motion letters, if any, are due to the Court on **April 25, 2016**.
- Dispositive motions due on or before **May 2, 2016**.
- Responses to motions shall be due on or before **May 31, 2016**.
- Reply briefs shall be due on or before **June 30, 2016**.

Dated: January 15, 2016

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 15, 2016, I caused the foregoing Proposed Revised Joint Case Management Schedule to be filed with the Clerk of the Court via CM/ECF, and notification of such filing will be sent electronically to all counsel of record for this matter.

/s/ Christopher Diffie  
*Attorney for Defendants*